

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,  
  
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a  
Washington Public Corporation; ELIZA  
SAUNDERS, Director of the Office of  
Public Records, in her personal and official  
capacity; ALISON SWENSON, Compliance  
Analyst, in her personal capacity; PERRY  
TAPPER, Public Records Compliance  
Officer, in his personal capacity; ANDREW  
PALMER, Compliance Analyst, in his  
personal capacity; JOHN or JANES DOES  
1-12, in his or her personal capacity,  
  
Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF  
JAYNE L. FREEMAN IN SUPPORT OF  
DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION FOR JOINDER  
OF PARTIES

I, Jayne L. Freeman, declare as follows:

1. I am one of the attorneys representing the Defendants in the above-referenced lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. Thus far in this litigation, I have been appointed to represent the only named Defendant, the University of Washington. After Plaintiff filed her First Amended Complaint [*Dkt.* 82], I was subsequently asked to file a Notice of Appearance on behalf of the additional named Defendants identified in the Amended Complaint.

1           3.       I waited until after 4:00 p.m. on Monday, April 16, 2018, the day  
2 Defendant's response to Plaintiff's Motion for Joinder was due, to file this response and  
3 accompanying declaration, because I still did not have confirmation as to whether Mr.  
4 Thomas would be withdrawing the motion.

5           4.       The following exhibits are cited or relied upon in Defendant's Response to  
6 Plaintiff's Motion for Joinder of Parties:

7                 A.       Attached as **Exhibit A** is a true and correct copy of a chain of email  
8 correspondence between Counsel for Defendant and Counsel for Plaintiff between  
9 April 6, 2018 and April 9, 2018.

10                B.       Attached as **Exhibit B** is a true and correct copy of additional email  
11 communications between counsel for Defendant.

12  
13           I declare under penalty of perjury under the laws of the State of Washington that the  
14 foregoing is true and correct to the best of my knowledge.

15  
16           DATED this 16<sup>th</sup> day of April, 2018, at Seattle, Washington.

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18                                 /s/ Jayne L. Freeman  
19                                 Jayne L. Freeman, WSBA #24318  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Attorneys for Plaintiff**

Mr. Joseph Thomas  
14625 SE 176th Street, Apt. N-101  
Renton, WA 98058-8994  
Telephone: (206) 390-8848  
Email: joe@joethomas.org

DATED: April 16, 2018

/s/ Jayne L. Freeman

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